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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RIGHTHAVEN LLC, a Nevada limited-  
liability company,

Plaintiff,

v.

THOMAS NEVEU, an individual,

Defendant.

THOMAS NEVEU, an individual,

Counter-claimant,

v.

RIGHTHAVEN LLC, a Nevada limited-  
liability company; and STEPHENS MEDIA  
LLC, a Nevada limited-liability company,

Counter-defendants.

Case No.: 2:10-cv-01674-GMN-LRL

**NOTICE OF NON-OPPOSITION TO  
THOMAS NEVEU'S MOTION TO SEAL  
AND MOTION TO STAY (Doc. ## 22, 23)  
WITH CERTIFICATE OF SERVICE**

Righthaven LLC ("Righthaven") hereby submits its non-opposition to Defendant/  
Counter-Claimant Thomas Neveu's ("Mr. Neveu") Motion to Stay Proceedings for Six Months

Pending Competency Hearing & Psychiatric Evaluation (Doc. # 22), and Motion to Seal Case (Doc. # 23). Righthaven has no opposition to a stay of these proceedings should the Court find that Mr. Neveu's asserted medical condition justifies such action. Righthaven's position in this regard is wholly consistent with its position when advised by Mr. Neveu of his asserted condition – he was advised to ask the Court for a stay, which he has now done.

With regard to Mr. Neveu's Motion to Seal the Case (Doc. # 23), Righthaven takes no position as to whether this action is warranted. Righthaven certainly has no interest in seeing that any confidential materials are disclosed in this action. This is precisely the underlying purpose for Righthaven seeking entry of stipulated protective orders in all actively litigated matters in this judicial district. Moreover, contrary to Mr. Neveu's letter to this Court, Righthaven has not publicly filed or otherwise publicly disclosed the contents of any confidential records provided by Mr. Neveu in this case.

Dated this 14<sup>th</sup> day of March, 2011.

SHAWN A. MANGANO, LTD.

By: /s/ Shawn A. Mangano  
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**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that on this 14<sup>th</sup> day of March, 2011, I caused **NOTICE OF NON-OPPOSITION TO THOMAS NEVEU'S MOTION TO SEAL AND MOTION TO STAY (Doc. ## 22, 23) WITH CERTIFICATE OF SERVICE** to be to be served by the Court's CM/ECF system, as well as deposited in a sealed envelope, a copy of in the United States Mail, with first-class postage affixed thereto, to the following persons on March 15, 2011:

Thomas Neveu  
23 Boutwell Street  
Dorchester, MA 02122-2513

SHAWN A. MANGANO, LTD.

By: /s/ Shawn A. Mangano  
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